

IN THE DISTRICT COURT OF GARVIN COUNTY, STATE OF OKLAHOMA

BRENT GRIMMETT and MICKIE
GRIMMETT,

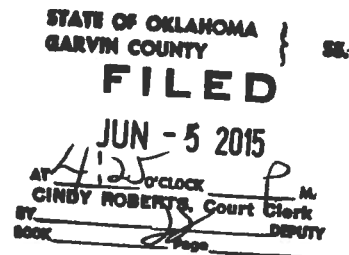
Plaintiff,

vs.

ALLSTATE INSURANCE COMPANY,

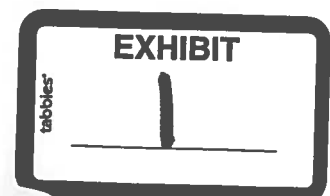
Defendants.

Case No. CJ-15-61



PETITION

1. At all pertinent times, plaintiffs were and are owners of a home at 401 N. Pine Street, Pauls Valley, Oklahoma.
2. Prior to June 7, 2014, defendant had issued to defendants a "Delux Plus Homeowners Policy" (No. 0 15 743034 04/20), which covered the plaintiffs' home and which was in full force and effect on that date.
3. On that date, the plaintiffs' home suffered storm damage and the plaintiffs suffered losses covered by the subject policy, and the plaintiffs promptly reported the loss to defendant.
4. The defendant was required under the insurance policy to timely pay plaintiffs' claim.



5. The defendant violated its duty of good faith and fair dealing by unreasonably, and in bad faith, refusing to pay plaintiffs the proper amount for a valid claim under the insurance policy.

6. The defendant's refusal to pay the claim in full was unreasonable under the circumstances. The defendant's unreasonable actions included, but are not limited to, offering unreasonably low amounts to satisfy the claim and excessively delaying payments.

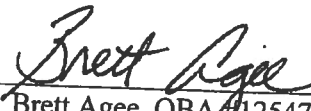
7. The violation by the defendant of its duty of good faith and fair dealing was the direct cause of the plaintiffs suffering financial losses, emotional distress, and other losses in an amount exceeding \$75,000.

8. The defendant acted in reckless disregard of the rights of the plaintiffs and acted intentionally and with malice towards plaintiffs. Plaintiffs are, therefore, entitled to an award of punitive damages in an amount exceeding \$75,000.

WHEREFORE, plaintiffs demand judgment against defendant for actual damages in excess of \$75,000, and for punitive damages in excess of \$75,000, and for such other relief to which they are entitled.

GARVIN, AGEE, CARLTON & MASHBURN, P.C.

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